

CRUSER, MITCHELL, NOVITZ, SANCHEZ, GASTON & ZIMET, LLP

ATTORNEYS AT LAW
ATLANTA OFFICE
MERIDIAN II, SUITE 2000
275 SCIENTIFIC DRIVE
NORCROSS, GA 30092

TELEPHONE (404) 881-2622
FACSIMILE (404) 881-2630
www.cmlawfirm.com

PRACTICING IN:
CALIFORNIA
FLORIDA
GEORGIA – ATLANTA/SAVANNAH
INDIANA
NEW JERSEY
NEW YORK
PENNSYLVANIA
SOUTH CAROLINA

WRITER'S DIRECT ACCESS
(678) 684-2149
khurley@cmlawfirm.com

April 23, 2019

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles L. Clay, Jr., Esq.
PRATT CLAY, LLC
4401 Northside Parkway, Suite 520
Atlanta, GA 30327

RE: Yvonne Byrd v. QuikTrip Corporation
State Court of Gwinnett County; Civil Action File No. 19-C-02224-S3

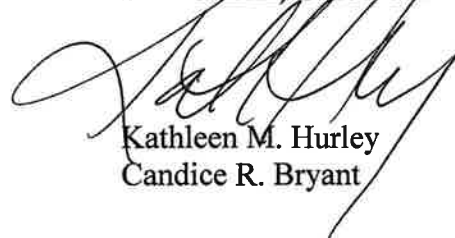
Dear Counsel:

In compliance with 28 U.S.C. §§ 1332, 1441, and 1446, this letter is to give you formal written notice that Defendant QuikTrip Corporation has filed a Notice of Removal with the United States District Court, Northern District of Georgia, Atlanta Division. I am enclosing a copy of the Notice of Removal.

In further compliance with 28 U.S.C. § 1446(d), I have filed the Notice of Filing Notice of Removal with the State Court of Gwinnett County, a copy of which I am also enclosing.

Very truly yours,

**CRUSER & MITCHELL, NOVITZ,
SANCHEZ, GASTON & ZIMET, LLP**



Kathleen M. Hurley
Candice R. Bryant

KMH/CRB
Enclosures



IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

YVONNE BYRD,

Plaintiff,

vs.

QUIKTRIP CORPORATION,

Defendant.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION

FILE NO. 19-C-02224-S3

DEFENDANT QUIKTRIP CORPORATION'S
NOTICE OF FILING NOTICE OF REMOVAL

TO: Charles L. Clay, Jr., Esq.
PRATT CLAY, LLC
4401 Northside Parkway, Suite 520
Atlanta, GA 30327

Pursuant to 28 U.S.C. § 1446(d), you are hereby notified that Defendant QuikTrip Corporation has filed a Notice of Removal of the above-styled action to the United States District Court for the Northern District of Georgia, Atlanta Division, a copy of which is attached hereto and by reference made a part hereof.

This 23rd day of April, 2019.

**CRUSER, MITCHELL, NOVITZ,
SANCHEZ, GASTON & ZIMET, LLP**



KATHLEEN M. HURLEY

Georgia Bar No. 379659

CANDICE R. BRYANT

Georgia Bar No. 807404

J. ROBB CRUSER

Georgia Bar No. 199480

Attorneys for Defendant

Meridian II, Suite 2000
275 Scientific Drive
Norcross, GA 30092
(404) 881-2622
(404) 881-2630 – fax
khurley@cmlawfirm.com
cbryant@cmlawfirm.com
rcruser@cmlawfirm.com

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

YVONNE BYRD,

Plaintiff,

vs.

QUIKTRIP CORPORATION,

Defendant.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION

FILE NO. 19-C-02224-S3

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the undersigned has this day electronically filed the within and foregoing **DEFENDANT QUIKTRIP CORPORATION'S NOTICE OF FILING NOTICE OF REMOVAL** with the Clerk of Court using the Odyssey e-FileGA system which will automatically send e-mail notification of such filing to the following attorneys of record:

Charles L. Clay, Jr., Esq.
PRATT CLAY, LLC
4401 Northside Parkway, Suite 520
Atlanta, GA 30327

This 23rd day of April, 2019.

**CRUSER, MITCHELL, NOVITZ,
SANCHEZ, GASTON & ZIMET, LLP**

Meridian II, Suite 2000
275 Scientific Drive
Norcross, GA 30092
(404) 881-2622
(404) 881-2630 – fax
khurley@cmlawfirm.com
cbryant@cmlawfirm.com
rcruser@cmlawfirm.com


KATHLEEN M. HURLEY

Georgia Bar No. 379689

CANDICE R. BRYANT

Georgia Bar No. 807404

J. ROBB CRUSER

Georgia Bar No. 199480

Attorneys for Defendant